

did knowingly and intentionally conspire and agree together and with other persons both known and unknown to the Grand Jury, to willfully and unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom, reward or otherwise J.L. and D.G. and, in committing or in furtherance of the commission of the offense, did willfully transport J.L. and D.G. in foreign commerce from the State of Texas to the United Mexican States.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the defendants or conspirators, both indicted and unindicted, committed, among others, the following overt acts in the Southern District of Texas:

1. On or about October 13, 2019, **JUAN MORENO (MORENO)** under threats of killing their families did direct J.L. and D.G. to travel on October 14, 2019 to a location in Edinburg, Texas.
2. On or about October 14, 2019, **OSCAR SERAFIN IBARRA (IBARRA)**, **GERARDO RUIZ (RUIZ)**, and **MORENO** met with J.L. and D.G. at a ranch in Edinburg, Texas.
3. On or about October 14, 2019, **IBARRA** and **RUIZ** tied up D.G. and J.L. in order to unlawfully seize and confine D.G. and J.L. and in doing so did instruct D.G. and J.L. either directly or indirectly that they were not free to leave.
4. On or about October 14, 2019, **IBARRA**, **RUIZ**, and **MORENO** did instruct D.G. and J.L. that they had to travel from the United States of America to the United Mexican States.
5. On or about October 15, 2019, **MORENO** rode in a vehicle with D.G. and J.L. that crossed the Donna, Texas Port of Entry traveling southbound leaving the United States of America and entering the United Mexican States.
6. On or about October 15, 2019, **IBARRA** and **RUIZ** escorted the vehicle transporting

MORENO, D.G., and J.L. that crossed the Donna, Texas Port of Entry traveling southbound leaving the United States of America and entering the United Mexican States.

7. On or about October 15, 2019, **RUIZ** called a co-conspirator to advise that D.G. and J.L. were then in the United Mexican States.
8. From on or about October 15, 2019, to on or about October 30, 2019, co-conspirators in the United Mexican States did continue to unlawfully seize and confine D.G. and J.L. against their will for ransom, reward or otherwise.
9. From on or about October 15, 2019 to on or about October 30, 2019, co-conspirators in the United Mexican States directed D.G. and J.L. to make international phone calls to individuals who could send payment to co-conspirators in exchange for the release of D.G. and J.L.

In violation of Title 18, United States Code, Section 1201(c).

Count Two

From on or about October 13, 2019, and October 30, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN MORENO
OSCAR SERAFIN IBARRA
and
GERARDO RUIZ**

did willfully and unlawfully seize, confine, inveigle, kidnap, abduct, and carry away and hold D.G. for ransom, reward, or otherwise, and, in committing or in furtherance of the commission of the offense, did willfully transport D.G. in foreign commerce from the State of Texas to the United Mexican States.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

Count Three

From on or about October 13, 2019, and October 30, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN MORENO
OSCAR SERAFIN IBARRA
and
GERARDO RUIZ**

did willfully and unlawfully seize, confine, inveigle, kidnap, abduct, carry away, and hold J.L. for ransom, reward, or otherwise, and, in committing or in furtherance of the commission of the offense, did willfully transport J.L. in foreign commerce from the State of Texas to the United Mexican States.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

Count Four

From on or about January 2017 through on or about May 20, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN MANUEL MORENO
GEOVANNY GARCIA-QUEVEDO
JUAN CARLOS RODRIGUEZ
also known as "Camilay"
ALEJANDRO ENRIQUE GEORGE-BOZA
JOSE JOEL QUEVEDO-BOUZAMAYOR
MARLON CERVELO-TRUJILLO
OILEVY BLANCO-PRIETO
DAVID GONZALEZ
EDGAR FUENTES-FUENTES
LAZARO CRUZ
LAUREANO JAVIER ROLDAN-QUEVEDO
ULISES MARINO
YETMIS MARTINEZ-PUJOL
JESUS M MESA
YOANY OCHOA-LABACENA
Also known as "Pitity"
JORGE MENDEZ CHAVEZ
AND**

JERMAN LOERA

did knowingly and intentionally conspire and agree together with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Count Five

From on or about January 2017 through on or about May 20, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**JUAN MANUEL MORENO
GEOVANNY GARCIA-QUEVEDO
JUAN CARLOS RODRIGUEZ
also known as "Camilay"**

and

JOSE JOEL QUEVEDO-BOUZAMAYOR

together and with others known and unknown to the Grand Jurors, did knowingly and intentionally conspire and agree with one another and others to commit certain offenses against the United States as follows:

(a) knowing that the property involved in a financial transaction represented proceeds of some form of unlawful activity, did conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity, that is, the felonious importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance, punishable under any law of the United States, contrary to Title 21, United States Code, Sections 841(a)(1), 846 and Sections 952(a), 960(a)(1), and 963, with the intent to promote the carrying on of specified unlawful activity and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of

specified unlawful activity and to avoid a transaction reporting requirement under State and Federal law, contrary to Title 18 United States Code, Sections 1956(a)(1); and

(b) did transport, transmit and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, the felonious importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance, punishable under any law of the United States, contrary to Title 21, United States Code, Sections 841(a)(1), 846 and Sections 952(a), 960(a)(1) and 963.

All in violation of Title 18, United States Code, Section 1956(h).

NOTICE OF FORFEITURE
21 U.S.C. 853(a); 28 U.S.C. 2461(c)

Pursuant to Title 21, United States Code, Section 853(a) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendant,

JUAN MANUEL MORENO
GEOVANNY GARCIA-QUEVEDO
JUAN CARLOS RODRIGUEZ
also known as "Camilay"
ALEJANDRO ENRIQUE GEORGE-BOZA
JOSE JOEL QUEVEDO-BOUZAMAYOR
MARLON CERVELO-TRUJILLO
OILEVY BLANCO-PRIETO
DAVID GONZALEZ
EDGAR FUENTES-FUENTES
LAZARO CRUZ
LAUREANO JAVIER ROLDAN-QUEVEDO
ULISES MARINO
YETMIS MARTINEZ-PUJOL
JESUS M MESA
YOANY OCHOA-LABACENA
Also known as "Pitity"
JORGE MENDEZ CHAVEZ
AND
JERMAN LOERA

that in the event of conviction for an offense charged in Counts 4 of the Sealed Superseding Indictment, the United States intends to seek forfeiture of: (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and (2) all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation. The property subject to forfeiture includes, but is not limited to, the following real and personal property:

A 2014 Mercedes Benz vehicle bearing VIN WD3PF1CC8E5858216;

A 2013 Dodge Ram truck bearing VIN 3C6UR5GL6DG530096;

A 2006 Freightliner tractor bearing VIN 1FUJBBCKX6PW86726;

A 2006 Freightliner tractor bearing VIN 1FUJBBCK56LW98497;

A 2009 Freightliner tractor bearing VIN 1FUJGLCK09LAE0127;

A 2013 Freightliner tractor bearing VIN 3AKJGLBG9DSBY9358;

A 2004 Great Dane trailer bearing VIN 1GRAA06234B702355;

A 2007 Great Dane trailer bearing VIN 1GRAA06237B700240;

A 2010 utility trailer bearing VIN 1UYVS253XAU886211;

A utility trailer bearing VIN 1UYVS2538YM911102;

A utility trailer bearing VIN 1UYVS253X7M945007;

A 2010 utility trailer bearing VIN 1XP5DB9X05D843264;

Lot 233 and 270, Evergreen Valley Estates, Phase II in Hidalgo County, Texas also known as 15719 E. Davis Road, Edinburg, Texas 78542 and 22111 Uresti St., Edinburg, Texas 78542; and
Lots 15 & 16, Los Feliz, Phase 1 in Hidalgo County, Texas also known as 25452 Brushline Road, Edinburg, Texas 78542;

Money Judgment

Defendant is notified that upon conviction, a monetary judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendant is notified that in the event that property subject to forfeiture, as a result of any act or omission of defendant,

(A) cannot be located upon the exercise of due diligence;

(B) has been transferred or sold to, or deposited with, a third party;

(C) has been placed beyond the jurisdiction of the court;

(D) has been substantially diminished in value; or

(E) has been commingled with other property that cannot be divided without difficulty, it is the intent of the United States to seek forfeiture of any other property of the defendant up to the total value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY